

UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF WASHINGTON  
AT SEATTLE

UNITED STATES OF AMERICA, ) NO. 2:11-cv-00050  
Plaintiff, )  
v. )  
DON BREAZEALE & ASSOCIATES, ) ANSWER OF DEFENDANTS  
INC., DONALD L. and IRENA B. )  
BREAZEALE, )  
Defendants. )

COMES NOW, Defendants, DON BREAZEALE & ASSOCIATES, INC., DONALD L. and IRENA B. BREAZEALE and answer Plaintiff's complaint as follows:

1. Deny allegations of paragraph 1.
2. Admit allegations of paragraphs 2, 3, 4, 5, 6, 7, 8, 9, 10, 11, and 12.
3. For lack of precise agreement, Defendants deny paragraphs 13, 14, 15, 16, and 17.
4. Deny in part, paragraphs 20 and 21.
5. Deny paragraphs 22 and 23.

AFFIRMATIVE DEFENSE

On or about December 2010, Plaintiff and Defendants ARRIVED AT AN ACCORD AND SATISFACTION OF THE Plaintiff's claim, in consideration of a sum of money,

ANSWER OF DEFENDANTS- 1

LAW OFFICES  
**SHULKIN HUTTON INC., P.S.**  
7900 SE 28<sup>TH</sup> STREET, SUITE 302  
MERCER ISLAND, WASHINGTON 98040  
TELEPHONE (206) 623-3515  
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1 conditioned on performance, and accepted by Plaintiff, and upon payment as required, in  
2 full satisfaction of the claims alleged in the complaint.

3 WHEREFORE, Defendants demand that judgment be entered as follows:

4 Dismissing Plaintiff's complaint with prejudice and without an award of costs and  
5 awarding Defendant statutory costs and attorney fees incurred in this action and such further  
6 relief as the court finds just and proper.

7  
8 DATED this 25th day of February, 2011.  
9

10 Respectfully submitted,  
11 DON BREAZEALE & ASSOCIATES, INC.,  
12 DONALD L. and IRENA B. BREAZEALE by  
their attorneys SHULKIN HUTTON INC., P.S.

13 By \_\_\_\_\_  
14 Jerome Shulkin WSBA #2198  
15 Attorney for Defendants.

ANSWER OF DEFENDANTS- 2

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